


Understanding EJIF Recommendations

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Birdsall Services Group

EJIF Annual Inspection

- Page 1 of 7 Rev. March 2011
- Inspection Date: _____
- EJIF Municipal Inspection Checklist
- Municipality Name: _____
- Administrator/Clerk: _____
- Primary DPW Contact: _____ Title: _____
- DPW Physical Address: _____
- Town: _____ Zip: _____
- Telephone: _____ Fax: _____
- E-mail address: _____
- Check if DPW mailing address is different from above. If so, please list the new address below: _____
- Number of facilities that Municipality operates: _____
- ____ DPW/Maintenance Garage _____ Recycling Depot _____ Shooting Range
- ____ Sewage Treatment Plants _____ Water Treatment Plans _____ Collection/Distribution Systems
- ____ Wells/Pump/Lift Stations _____ Marinas _____ Other: _____
- Has the Municipality acquired any additional properties/facilities in the past year? ____Y ____N ____Unknown (Indicate in Notes)
- Is EJIF Poster posted in DPW or in accordance with emergency procedures? ____Y ____N
- SECTION I - USTs
- 1. How many active USTs are listed in the database? _____ New? _____ Removed since last inspection? _____
- 2. Has the inspector confirmed UST information from the EJIF Municipality database with the Municipal Representative? _____
- 3. Is each UST registered with NJDEP? If no, list: _____
- (Heating Oil USTs are regulated when a facility's aggregate HO volume exceeds 2,000 gallons.)
- 4. Have all non-regulated Heating Oil USTs older than 15 years passed an integrity test within the past year? (If No. -2 points) Date of last test: _____
- 5. Does each facility have a Release Response Plan? (If No. -5 points)



EJIF Annual Inspection Report

- Borough of Surf City
813 Long Beach Blvd.
Surf City, NJ 08008
- Attn: Administrator
- Re: 2011 Environmental Joint Insurance Fund (EJIF) Audit Borough of Surf City - Ocean JIF**
- Dear Administrator:
- On behalf of the Environmental Joint Insurance Fund (EJIF), Birdsall Services Group (BSG) would like to thank the Borough of Surf City for their assistance during the annual audit of your facilities on March 30, 2011. Attached please find a copy of the results of the audit.
- Certain environmental concerns were identified during the audit of the DPW facility and other municipally-owned properties. BSG would like to make the following recommendations to assist your Municipality in complying with various New Jersey and Federal environmental regulations:
- In accordance with Spill Prevention Control and Countermeasures (SPCC) regulations (US EPA 40 CFR part 112), the Borough's aboveground gasoline/diesel split tank requires a form of overfill protection and leak detection. Surf City must verify that these devices are in place and operational to ensure they are in compliance with this rule.
- Please note that any items listed above that might cause violations of New Jersey and Federal environmental regulations may affect the Borough's ability to file a claim for losses due to these items.



EJIF Annual Inspection Report

▶ NJDEP's Known Contaminated Sites - 2011

▶ **Municipality** **PI Name** **Address** **Home Owner** **Site ID**
Site Status **PI Number**

▶ Surf City Boro SURF CITY BORO 813 LONG BEACH BLVD No 58978 Active 013427

▶ Surf City Boro WALT SMITH'S GARAGE N 19TH ST & LONG BEACH BLVD No 41456 Active 000260



BURLCO - Common Issues

▶ Spill Prevention Control & Countermeasures
 ◦ 10 Towns require an SPCC Plan
 ◦ Only two (2) of these towns have an SPCC Plan

▶ Floor Drains
 ◦ 10 Towns have floor drains
 ◦ Three (3) systems discharge to the environment

▶ Stormwater BMPs
 ◦ 18 Towns hold a Tier A Permit (5 hold Tier B)
 ◦ Many are deficient in at least one SOP

▶ Underground Storage Tanks
 ◦ Eight (8) USTs are Active; require regular attention
 ◦ Three (3) are not recommended for insurance.



BURLCO Claims - A Few Examples

Issue	Result	Comment
Sewer Leak	Sewerage line break, drained into surface water.	
UST Overflow	Floodwater entered UST vent displacing oil into the interior and exterior of the building. UST was not insured.	
Sewer Backup	Backup caused sewerage to impact streets.	
Tanker Crash	Gasoline Tanker crashed on County Road. Town seeking reimbursement.	
Leaking USTs	Three pulled USTs all had corrosion holes. Product had contaminated groundwater. USTs were not insured.	Preventable - UST Maintenance
Discovered USTs	During a Phase 1, two improperly abandoned USTs found. USTs were not insured.	
Hydraulic Spill	20 gal of hydraulic fluid discharged to gravel road. Twp stockpiled 240 sf area for disposal.	Preventable - Stormwater BMP
Hydraulic Spill	Third party truck leaked hydraulic oil into stone DPW yard DPW. Sent 14cy to landfill as oil-contaminated waste. No claim.	
Underground Pipe Leak (AST)	Underground pipe from AST discharged to environment. Tank and piping were subject to SPCC - not inspected.	Preventable - SPCC Program
UST Leak	UST piping failed a leak test; contamination. UST was not insured.	Preventable - UST Maintenance



SPCC – Solutions (1)

- ▶ Reduce capacity below 1,320 gallons
- ▶ Plan Development
 - Tier 1 Qualified Facility – Use template, Self-certify
 - Less than 10,000 gallons; no tanks over 5,000 gallons
 - Tier 2 Qualified Facility – Full Plan, Self-certify
 - Less than 10,000 gallons with a tank over 5,000 gallons
 - Non-Qualified Facilities – Full Plan, PE certification
 - More than 10,000 gallons or have a spill history
- ▶ Training
 - Conduct in-house training for applicable personnel
 - Couple with stormwater training (They overlap!)



SPCC – Solutions (2)

- ▶ Secondary Containment
 - Required for Tank, Piping and Transfer Area
 - Size to largest single tank, not cumulative
 - Options:
 - Asphalt berm*
 - Cinder block wall*
 - "Bath Tub" (steel or plastic)*
 - Concrete containment*
 - Building/Slab grading*
 - Distance over pervious material (grass, gravel)
(Expensive to remediate – highly discouraged!!)
- *Account for stormwater accumulation
 - Rain cover: Fabricated, Shed, Lean-to, Tarp
 - Valve/Pump (requires visual inspections & recordkeeping)



SPCC – Solutions (3)

- ▶ Corrosion Protection
 - Required for underground piping (monitoring and inspection required)
 - Options:
 - Non-corrosive material
 - Sacrificial Anode (requires monitoring)
 - Impressed Current (requires monitoring)



Floor Drains – Solutions

- ▶ Seal the drains; Cease the discharge
- ▶ Vehicle & Equipment Washing Options
 - Salt spreaders and fire vehicles are exempt
 - Connect to sanitary (May require connection permit)
 - Discharge to storage tank
 - Wash bay with a recaptured water system
 - Shared-services with Town, County, or Authority
 - Commercial car wash
 - Service: Fleet Wash or similar
 - Product: Inflatable wash pad



Stormwater BMPs – Solutions (1)

- ▶ Source Material Inventory (SMI)
 - Cover all source materials in yard or place on SMI
- ▶ Bulk Fueling SOP
 - Drip pans must be placed under all connections
 - Trucks or stormwater conduits must be blocked
 - Delivery must be supervised by municipal personnel
- ▶ Vehicle Maintenance SOP
 - Perform all maintenance indoors on a paved surface
 - Tarp outdoor vehicles and use drip pans



Stormwater BMPs – Solutions (2)

- ▶ Good Housekeeping SOP
 - Label all containers
 - Outdoor drums must be covered and contained
 - Spill kits & drip pans must be near all liquid transfer areas
 - Spills must be dry-cleaned immediately
- ▶ Salt & De-icing Material
 - Keep salt in the salt shed
 - Salt trucks/spreaders may be rinsed with clean water
- ▶ Inspections (*requires recordkeeping*)
 - Inspect all Yard Operations regularly
 - Inspect secondary containment areas as necessary



UST - Discussion

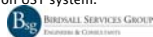
- ▶ Nearly every UST systems is unique and requires a detailed evaluation
- ▶ Unregulated UST systems (heating oil tanks <2000 gal) require the following:
 - Annual integrity test after 15 years old



UST - Discussion



- ▶ Regulated UST systems require the following (with exceptions):
 - Proper NJDEP Registration
 - Release Response Plan
 - Proper fill port markings
 - **Leak Detection (Tank & Piping)**
 - **Corrosion Protection (Tank & Piping)**
 - **Overflow Prevention**
 - **Spill Protection**
 - Testing, Inspections & Recordkeeping required per NJ Administrative Code & manufactures' specs
 - Might be **daily** (vapor recovery), **monthly** (leak detection), **annual/triennial** (corrosion protection) or anything in between; Based on UST system.



Resources

- ▶ BSG can provide the following services/resources:
 - BSG Hotline (24/7 emergency response)
 - Claims investigation/guidance
 - New property investigations
 - Environmental Alerts for changing policy & regulations
 - **SPCC Guidance and Materials**
 - **POTW Connection Guidance**
 - **Stormwater Guidance and Materials**
 - **UST Guidance and Materials**
 - Air General Permit Applications & Compliance Plans
 - Emergency Generator Recordkeeping Logs
 - Recycling/Solid/Universal Waste Guidance and Materials
 - Etc.



Resources

www.njejif.org

Environmental Information

- Audit Paperwork and Associated Information
- Environmental Alerts
- Annual Seminar Presentations

Claims Procedures

- EJIF/BSG/NJDEP Hotline Poster
- Emergency Response Plan Guidance

Contacts

- Executive Committee
- Fund Professionals
- Member JIFs



Questions?

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